

**Summary of the  
On-Site Assessment Committee Meeting  
July 29, 1997**

The On-Site Assessment Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met on Tuesday, July 29, 1997, from 12:45 p.m. to 4:30 p.m. The meeting was led by its chair, Mr. Gary K. Bennett, USEPA Region 4, using the agenda distributed prior to the meeting. A list of action items is provided in Attachment A. A list of Committee members is provided in Attachment B.

**INTRODUCTION**

Following a welcome by the Committee Chair, the members of the On-Site Assessment Committee introduced themselves. There followed an explanation of the approach and ground rules for the meeting. The first order of business was to address those portions of the standard which had not yet been passed. The second order of business was to address the draft Assessor Training Manual. It was decided that comments on previously passed portions of the standard would be addressed if time permitted.

**CHAPTER 3 (BODY)**  
**Overview and Editorial Changes**

The following editorial changes to Chapter 3 were discussed:

Section 3.2.1 - The words “and promulgation” have been struck with the thinking that the word “promulgation” connotes the passing of federal regulations

There was some discussion of whether military environmental programs would fall under NELAC, of whether NELAC applies to CERCLA/RCRA and Superfund cleanup work, and whether reciprocity of certification for laboratories performing CERCLA/RCRA analyses would exist under NELAC. It was noted that NELAC was intended to address all EPA programs requiring environmental data.

Section 3.2.2 - The second paragraph references section 6.6 - should be section 6.7

Section 3.2.4 - Add word “provide”

Section 3.4.2.1 - Change “should” in first sentence to “must” to indicate that this is not optional

Section 3.5.4 - Change “may” to “should,” indicating that this is a recommended activity

Section 3.5.6 - The word “and” has been deleted to indicate that the plan of corrective action should be submitted within 30 days, rather than requiring all deficiencies to be corrected within 30

days. This section should reference section 4.1.3.b rather than 4.1.4

Section 3.6.1 - The first sentence has been changed from future tense to present tense - “The NELAP Assessor Training Manual is presented in Appendix A.” The second sentence will stand as written with the deletion of the word “provided” and a substitution of “as a reference” for “as guidance.” The words “provided to” and “should” have been struck from the third sentence. It was noted that in the Committee’s last teleconference meeting there was considerable discussion of items j and k in reference to health and safety procedures. The Committee would like to strike item k from section 3.6.1 because an on-site assessor would not necessarily be able to evaluate all laboratory waste disposal procedures. Although not the primary intent of the assessment, it was noted that an assessor would be remiss in failing to report an obviously unsafe procedure. For this reason the Committee would like to retain item j, which refers to “general health and safety procedures.” In response to a question of whether the assessors would receive training in health and safety procedures, the Committee responded that the assessors would have laboratory experience on which to rely. It was noted that although the Assessor Training Manual mentions this item, the manual does not include an elaboration on the evaluation of health and safety procedures. After considerable discussion, the Committee voted to delete items j and k from this section.

Section 3.6.4 - The Committee voted to delete items j and k.

In response to the question of whether the assessment checklists would be limited to the items in sections 3.6.1 and 3.6.4, the Committee responded that there would be additional discussion of the checklists in the future, at which time, the Committee might include additional items in the checklists.

### **“Grandfathering” (Section 3.2.2)**

The Committee has added a statement which exempts assessors, already employed by an accrediting authority, from the requirement for on-site assessment training with a qualified assessor, provided they meet all other NELAC educational and experience criteria. Mr. Steven Baker noted that the Arizona Department of Health does not favor “grand fathering” of assessors, and that the proposed statement is a Committee compromise. Assessors will be required to complete the specified training within five years of NELAP implementation.

A request was made for clarification of the first sentence of section 3.2.2 (Basic Qualifications), specifically what is meant by “a basic science”? It was noted that the Committee does not wish to be too prescriptive in this regard. It was suggested that the word “bachelor’s” be substituted for the more prescriptive “B.S.” The Committee Chair requested that this suggestion be submitted in writing for consideration at the interim meeting.

### **Confidential Business Information (CBI) (Section 3.4.5 & Appendix B)**

It was noted that the Committee does not think that this is an issue which will be encountered often. The intent of this section is to address information which an assessor might require in the course of an assessment which could be confidential or proprietary business information. It was noted that assessors would need CBI training. A Committee member noted that laboratories often sign contracts for CBI which are not recognized by law. In response to this, the addition of “in accordance with federal and state law” to the end of the last sentence of paragraph two of section 3.4.5 was proposed and approved. There was some discussion of what portion of an assessment report, if any, would be posted on the worldwide web. This may be an issue for the National Database Committee.

### **Checklists (Section 3.6.3)**

A recent suggestion by EMMC that the language in section 3.6.3 be reserved until standardized checklists are developed was entered into discussion. There was some belief that the language should be left in place, that compliant assessments cannot take place until checklists exist, and that checklists cannot be developed until the standards are complete. The Committee decided not to change the language.

### **Assessor’s Roles (Section 3.6.2)**

Clarification of the last paragraph was requested by a Committee member. It was noted that an assessor is acting on behalf of a civil agency rather than a criminal investigation or agency. The assessor’s job is data assessment. The assessor is within his or her authority to obtain anything that pertains to compliance data if acting in a compliance role for the accrediting authority.

### **Further Discussion on the Standard**

It was noted that the standard does not address a laboratory’s right to refuse an assessor (per ISO 58). This would most likely occur in cases of conflict of interest. In reply the Committee pointed out that, although an initial audit is usually announced, some states use subsequent unannounced site audits. The Committee also noted that the Assessor Training Manual does recommend announced assessments in section 4.2.2. The Committee Chair requested that this comment be submitted in writing.

## **APPENDIX A - ASSESSOR TRAINING MANUAL Overview**

The Committee noted that the Assessor Training Manual was developed by a contractor and has been put out for review and comments. The Committee encouraged the submission of comments and questions in writing. The Committee expressed concerns with portions of chapter 4, and emphasized that much work on the manual is still to be done. Chapter 5 has received little review by the Committee. A question was raised as to whether policy has been extrapolated into the training manual. There was much discussion of specialized training of assessors.

## **SUMMARY AND ACTION ITEMS**

Two action items were noted by the Committee Chair:

- 1) Revise Assessor Training Manual and develop Assessor Training Course standards
- 2) Develop standardized checklists

## **CONCLUSION**

There being no further business, the meeting was adjourned at 4:30 p.m.

**ACTION ITEMS**  
**On-Site Assessment Committee Meeting**  
**July 29, 1991**

<b>Item No.</b>	<b>ACTION</b>	<b>Date Completed</b>
1	Revise Assessor Training Manual and develop Assessor Training Course standards	
2	Develop standardized checklists	

**LIST OF COMMITTEE MEMBERS****On-Site Assessment Committee****July 29, 1997**

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